

UNITED STATES DISTRICT COURT
District of New Hampshire

Frost Solutions, LLC,)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 1:22-cv-401-AJ
)	
Patrick Baglien, Christopher Lareau,)	
and Vue Robotics, LLC,)	
)	
Defendants)	

DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT

Defendants Patrick Baglien, Christopher Lareau, and Vue Robotics, LLC (collectively, “Defendants”), through their attorneys, Hoefle, Phoenix, Gormley & Roberts, PLLC, in accordance with LR 7.2(a) and Fed. R. Civ. P. 6(b), respectfully request that the Court extend their deadline to respond to the Complaint [Dkt. #1] filed against them by Plaintiff Frost Solutions, LLC (“Plaintiff”), to and including December 9, 2022, and in support thereof, state as follows:

1. Plaintiff alleges Defendants violated non-competition, non-solicitation and confidentiality agreements relating to their employment by Plaintiff, as well as pleading claims for alleged violations of the Defend Trade Secrets Act and alleged violations of the New Hampshire Uniform Trade Secrets Act. (*See generally* Complaint)

2. Plaintiff’s counsel wrote the individual Defendants by correspondence dated June 8, 2022, alleging violations of the agreements and demanding they cease the same. (Complaint, ¶ 46; Complaint Ex. D)

3. Defendants’ corporate counsel promptly disputed Plaintiff’s allegations. (Complaint Ex. E)

4. Four months after the demand, on October 5, 2022, Plaintiff filed the instant Complaint.

5. On October 20, 2022, Defendants Christopher Lareau and Vue Robotics, LLC were served in Kentucky, requiring these defendants to file an Answer or otherwise respond to the Complaint by November 10, 2022.

6. On October 24, 2022, Defendant Patrick Baglien separately received a copy of the Summons and Complaint via Fed Ex delivery.

7. Defendants have been engaged with their insurance carrier regarding the existence and scope of potential coverage.

8. If the carrier and the Defendants come to terms, panel counsel will likely be appointed. Otherwise, the Defendants will retain personal counsel.

9. It is expected that process will consume the better part of the next 30 days. Accordingly, it is requested that all Defendants' deadline to respond to the Complaint be extended to December 9, 2022.

10. Furthermore, the additional time will permit the Defendants to coordinate with counsel regarding the allegations, claims, defenses, pertinent documents, and to prepare appropriate responses to the Complaint.

11. This is Defendants' first requested extension of time to file a response to the Complaint.

12. No prejudice will result to Plaintiff, and this Motion is not interposed for purposes of delay or harassment.

13. In accordance with LR 7.2(a), the extension requested herein will not result in a continuance of any hearing, conference, or trial.

MEMORANDUM OF LAW

Given the nature of relief requested, no memorandum of law is necessary

CONCURRENCE SOUGHT

The undersigned has contacted Plaintiff's counsel regarding the requested relief and Plaintiff does not consent to the relief requested herein.

CERTIFICATE OF SERVICE

Plaintiff's counsel has been served with the instant Motion via the court's ECF system.

WHEREFORE, for good cause shown, pursuant to with LR 7.2(a) and Fed. R. Civ. P. 6(b), Defendants respectfully request that the Court grant their Motion, enter an Order extending their deadline to respond to the Complaint up to and including December 9, 2022, and for any further relief that the Court deems just and proper.

Respectfully submitted,
PATRICK BAGLIEN, CHRISTOPHER
LAREAU, and VUE ROBOTICS, LLC
By and through their attorneys
HOEFLE, PHOENIX,
GORMLEY & ROBERTS, PLLC

Dated: November 7, 2022

/s/Lawrence B. Gormley
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